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**From:** BECKHAM, LISA [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=75A0012699094CF59508BB04E90B393C-LBECKHAM]  
**Sent:** 10/10/2017 9:22:08 PM  
**To:** Bhaskar Chandan [BChandan@aqmd.gov]  
**CC:** Nguyen, Thien Khoi [nguyen.thien@epa.gov]; Andrew Lee [ALee@aqmd.gov]  
**Subject:** RE: Combustion of Waste - Applicability Determinations

Hi Bhaskar,

It seems my memory failed me. I think I was thinking of the ability of engines to burn landfill gas and not pyrolysis units.

Specifically for HMIWI, I think the determinations we have made thus far have largely focused on the fact that an HMIWI unit is a unit that *combusts* any amount of HMI waste. In the Green Power determination I sent – we stated that if a unit did not have onsite combustion then it would not be subject to the applicable incineration requirements.

That seems like the mostly likely avenue for getting out of incineration requirements – no onsite combustion.

In the case of sewage sludge – the applicable subpart does not have a specific pyrolysis exemption. So, similarly, any onsite combustion is likely to pull them in.

Of course, this email does not represent an official applicability determination from EPA. ;)

Lisa

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**From:** Bhaskar Chandan [mailto:BChandan@aqmd.gov]  
**Sent:** Tuesday, October 10, 2017 1:40 PM  
**To:** BECKHAM, LISA <BECKHAM.LISA@EPA.GOV>  
**Cc:** Nguyen, Thien Khoi <nguyen.thien@epa.gov>; Andrew Lee <ALee@aqmd.gov>  
**Subject:** RE: Combustion of Waste - Applicability Determinations

Thanks, Lisa. Really appreciate your follow up on this. There are several interesting determinations that will help us going forward. However, I did not see any determination specific to pyrolysis generated syn gas that is vented to an IC engine. It was mentioned in our meeting that the incinerator regs may not be applicable to this syn gas, and since we are expecting new applications for a similar project, we were interested in finding out more about this particular determination. If you can point us to the project where this determination was made, it would help us tremendously.

We are still awaiting the applications for the proposed sewage sludge pyrolysis in Rialto, CA, and will have a better handle on the issues once we receive the applications – hopefully in the next couple of months. Thanks, again!

Sincerely,

Bhaskar Chandan, P.E., QEP  
Supervising Air Quality Engineer  
Energy/Public Services/Waste Management/Terminals – Permitting  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765

Phone: (909) 396-3902  
Fax: (909) 396-3341

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**From:** BECKHAM, LISA [<mailto:BECKHAM.LISA@EPA.GOV>]  
**Sent:** Friday, October 6, 2017 10:47 AM  
**To:** Bhaskar Chandan <[BChandan@aqmd.gov](mailto:BChandan@aqmd.gov)>  
**Cc:** Nguyen, Thien Khoi <[nguyen.thien@epa.gov](mailto:nguyen.thien@epa.gov)>  
**Subject:** Combustion of Waste - Applicability Determinations

Hi Bhaskar,

I've pulled together some other EPA applicability determinations that may be helpful as reference in determining when a waste stream triggers the waste incineration/combustion requirements. I'm not sure it really answers any particular question, but hopefully some of the scenarios are useful. ;)

Lisa Beckham  
Environmental Engineer  
Air Permits Office  
EPA Region 9  
(415) 972-3811